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Suite 1200  
McLean, VA 22102

Todd Slamowitz  
(703) 584-8673  
tslamowitz@fccclaw.com  
WWW.FCCCLAW.COM  
NOT ADMITTED IN VA

LNGS

LUKAS,  
NACE,  
GUTIERREZ  
& SACHS, LLP

Accepted / Filed

July 1, 2016

JUL - 1 2016

Federal Communications Commission  
Office of the Secretary

**VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W., Room TW-A306  
Washington, DC 20554

**ORIGINAL**

**Re: WT Docket No. 10-208  
Union Telephone Company  
FCC Form 690 Mobility Fund Phase I Annual Report  
SAC(s): 518001, 518002, 518003, 518004, 518005, and 518006**

Dear Secretary Dortch:

DOCKET FILE COPY ORIGINAL

For the state and Study Area Codes (SAC) set forth below, please find attached a copy of each FCC Form 690 Mobility Fund Phase I Annual Report ("FCC Form 690") submitted with the Universal Service Administrative Company (USAC) by Union Telephone Company ("Union") pursuant to Section 54.1009 of the Commission's rules for each study area Union is authorized to receive support. Copies of the FCC Form 690 are also being submitted with the relevant state Commission.

State	SACs
Wyoming	518001, 518002, 518003, 518004, 518005, and 518006

A copy of this cover letter has been provided, which you are requested to date-stamp and return.

Sincerely,



Todd Slamowitz

Attachments

No. of Copies rec'd 0  
List ABCDE

**Mobility Fund**  
**Phase 1 - §54.1009 Annual Reporting**  
**Data Collection Form**

FCC Form  
Approved by OMB  
OMB 3060-1185  
Avg. Burden Estimate per Respondent: 18 Hours

<010> Study Area Code 518001

<015> Study Area Name Union Telephone Company

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Todd Slamowitz

<035> Contact Telephone Number: Number of the person identified in data line <030> 7035848678 ext.

<039> Contact Email: Email of the person identified in data line <030> tslamowitz@fcc.law.com

**Accepted / Filed**

**JUL - 1 2016**

**Federal Communications Commission  
Office of the Secretary**

<040> **Has the information required pursuant to §54.1009 been provided with a Form 481 filing (Y/N)** <040> ☒ ☐

<041> Attach a description of the documents filed with the Form 481 reporting

<041> Line 041-Union.pdf

<042> Cite the Study Area Code (SAC) for the Form 481 reporting

<042> 519905

<080> **Tribal Lands Reporting (y/n?)** (Does this study area cover tribal lands? Yes or No)

☐ ☒

**Notice to Individuals Required by the Paperwork Reduction Act of 1995**

OMB Control Number 3060-1185 (Annual Report for Mobility Fund Phase I Support, FCC Form 690 and Record Retention Requirements)

**Notice to Individuals Required by the Paperwork Reduction Act of 1995**

Public reporting burden for this collection of information is estimated to average 18 hours per response. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, Office of Managing Director, AMD-PER, Washington, DC 20554, Paperwork Reduction Act Project (3060-1185). Please DO NOT SEND COMPLETED FORMS TO THIS ADDRESS. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number and/or we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1185.

THIS NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

**Reporting Carrier / Mobility Fund Phase 1 Winning Bidder**

<110>	FCC Registration Number	1630201
<111>	Filing Carrier Name	UNION TELEPHONE COMPANY
<112>	Winning Bidder Carrier Name	UNION TELEPHONE COMPANY
<113>	Street Address (or PO Box)	PO BOX 160
<114>	City	MOUNTAIN VIEW
<115>	State	WY
<116>	Zip-Code	82939
<117>	Telephone Number	3077826131 ext.
<118>	Fax Number	3077826913
<119>	Email Address	CRENO@UNIONWIRELESS.COM

**Contact Information**

if same as above, indicate in this box



<120>	Name (First, MI, Last, Suffix)	CHRIS RENO
<121>	Filing Carrier Name	UNION TELEPHONE COMPANY
<122>	Street Address (or PO Box)	PO BOX 160
<123>	City	MOUNTAIN VIEW
<124>	State	WY
<125>	Zip-Code	82939
<126>	Telephone Number	3077826131 ext.
<127>	Fax Number	3077826913
<128>	Email Address	CRENO@UNIONWIRELESS.COM

**Authorized Agent Information**

if no agent, indicate in this box



<130>	Name (First, MI, Last, Suffix)	Todd Slamowitz
<131>	Company	Lukas, Nace, Gutierrez & Sachs, LLP
<132>	Street Address (or PO Box)	8300 Greensboro Drive, Suite 1200
<133>	City	McLean
<134>	State	VA
<135>	Zip-Code	22102
<136>	Telephone Number	7035848678 ext.
<137>	Fax Number	7035848696
<138>	Email Address	tslamowitz@fcclaw.com

<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com
<140>	Coverage and Performance Report Year	06/2015 - 06/2016

060 Coverage and Performance Report.zip

### Coverage and Performance attachments

<141>

[illegible]

Percentage of Total  
Population Reached by  
Service

0

Percentage of Total  
Road Miles covered  
by Service

0

<010> Study Area Code	518001
<015> Study Area Name	Union Telephone Company
<020> Program Year	2016
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<035> Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

## TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING CERTIFICATION DATA ON ITS OWN BEHALF:

<b>Certification of Officer or Employee as to Compliance with 47 CFR §54.1009(a)(4)</b>	
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4), the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	CERTIFIED ONLINE Date 07/01/2016
Printed name of Authorized Officer: Chris Reno	
Title or position of Authorized Officer: Director of Accounting	
Telephone number of Authorized Officer: 3077826131 ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING CERTIFICATION DATA ON THE CARRIER'S BEHALF:

<b>Certification of Officer or Employee to authorize an Agent to file Compliance with 47 CFR §54.1009(a)(4) on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Lukas, Nace, Gutierrez &amp; Sachs, LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4) reported to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: Lukas, Nace, Gutierrez & Sachs, LLP	
Name of Reporting Carrier: Union Telephone Company	
Signature of Authorized Officer or Employee:	Date:
Printed name of Authorized Officer or Employee:	
Title or position of Authorized Officer or Employee:	
Telephone number of Authorized Officer or Employee:	
Study Area Code of Reporting Carrier: 518001	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## TO BE COMPLETED BY THE AUTHORIZED AGENT:

<b>Certification of Agent Authorized to File Compliance with 47 CFR §54.1009(a)(4) on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the certification on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: Union Telephone Company	
Name of Authorized Agent Firm: Lukas, Nace, Gutierrez & Sachs, LLP	
Signature of Authorized Agent or Employee of Agent:	Date: 06/30/2016
Name of Authorized Agent Employee: Todd Slamowitz	
Title or position of Authorized Agent or Employee of Agent: FCC Legal Counsel	
Telephone number of Authorized Agent or Employee of Agent: 7035848678 ext.	
Study Area Code of Reporting Carrier: 518001	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccclaw.com

&lt;142&gt; State

&lt;143&gt; County

&lt;144&gt; Tribal Land(s) on which ETC Serves

&lt;145&gt; Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, Not Applicable) for each of these boxes to confirm the status described on the attached PDF, on line 145, demonstrates coordination with the Tribal government pursuant to § 54.1004 includes:

- <146> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <147> Feasibility and sustainability planning;
- <148> Marketing services in a culturally sensitive manner;
- <149> Compliance with Rights of way processes
- <150> Compliance with Land Use permitting requirements
- <151> Compliance with Facilities Siting rules
- <152> Compliance with Environmental Review processes
- <153> Compliance with Cultural Preservation review processes
- <154> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, Not Applicable)

<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccclaw.com

<200> Date Authorized to Receive Support  
<201> Targeted Completion Date  
<202> Total Mobility Fund Support Awarded  
<203> Total Mobility Fund Support Disbursed

07/29/2013

07/30/2016

7167104

2389034.67

&lt;210&gt; Actual Completion Date

&lt;211&gt; Project Status Description (attached)

518001\_ Carbon WY-1\_PSD.pdf

{Name of PDF attached}

Please check these boxes below to confirm that the attached PDF, on line 211, contains a project status pursuant to §54.1005(b)(2)(v). The information shall be submitted as appropriate.

<212> Status of Network Deployment - Network Design  
<213> Status of Network Deployment - Construction  
<214> Status of Network Deployment - Deployment  
<215> Status of Network Deployment - Maintenance  
<216> Project Budget Status  
<217> Project Plan Status

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

&lt;218&gt; Network will Support 3G/4G Mobile Service ?

☐ 3G ☒ 4G

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ON ITS OWN BEHALF:**

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the reporting requirements for Mobility Fund recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.



<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
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<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccclaw.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ON THE CARRIER'S BEHALF:

**Certification of Officer to Authorize an Agent to File for Mobility Fund Recipients on Behalf of Reporting Carrier**

I certify that (Name of Agent) Lukas, Nace, Gutierrez & Sachs, LLP is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.

Name of Authorized Agent: Lukas, Nace, Gutierrez & Sachs, LLPName of Reporting Carrier: Union Telephone Company

Signature of Authorized Officer:

Date:

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: 518001Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

**Certification of Agent Authorized to File for Mobility Fund Recipients on Behalf of Reporting Carrier**

I, as agent for the reporting carrier, certify that I am authorized to submit the reports for Mobility Fund recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier: Union Telephone CompanyName of Authorized Agent Firm: Lukas, Nace, Gutierrez & Sachs, LLP

Signature of Authorized Agent or Employee of Agent:

Date: 06/30/2016Name of Authorized Agent Employee: Todd SlamowitzTitle or position of Authorized Agent or Employee of Agent: FCC Legal CounselTelephone number of Authorized Agent or Employee of Agent: 7035848678 ext.Study Area Code of Reporting Carrier: 518001Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

## Attachments

<010>	Study Area Code	518001
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccilaw.com
<140>	Coverage and Performance Report Year	06/2015 - 06/2016

[illegible]

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**FCC Form 690**

**Mobility Fund Phase 1 – § 54.1009 Annual Reporting**

**Line 041: Description of documents filed with Form 481**

The documents filed with FCC Form 481 in its Annual Report include:

- Unfulfilled Service Requests (voice), if any.
- Service Quality Standards & Consumer Protection Rules Compliance.
- Functionality in Emergency Situations.
- Tribal Government Engagement Obligation.
- Voice Services Rate Comparability Certification.

## **FCC FORM 690**

### **(060) COVERAGE AND PERFORMANCE REPORT**

Union Telephone Company ("Union") did not complete any drive tests or related coverage files in submission format with respect to the SAC associated with this filing during the reportable period. Union is currently undergoing drive testing and intends on submitting the data and related coverage files in conjunction with its Payment Request 3 Form 690 for this SAC.



Study Area Code: 518001  
Study Area Name: Carbon, WY  
Program Year: 2016  
Contact Person: Chris Reno  
Contact Telephone Number: 307-782-6131  
Contact Email: [creno@unionwireless.com](mailto:creno@unionwireless.com)  
Carrier Reference Name: Carbon WY-1

---

## PROJECT STATUS DESCRIPTION

### SECTION I: DESCRIPTION OF OVERALL PROJECT PLAN

- 3G RNC/MSC/GGSN/SGSN PLUS 4G EPC

In order to launch this system, the necessary 3G and 4G core network needed to be completed and turned operational. This system totals roughly \$3.4 million in network core equipment, which will be shared across all 6 census tracts granted funding to Union Telephone Company in the FCC 901 Mobility Fund.

The core is located in Cheyenne, Wyoming and is fed via dual OC12 networks, giving full redundancy and capacity to support all tower sites related to this project and other network growth on the Union Wireless network. Additional OC12's are already planned as demand increases and also to provide carrier diversity in case of an outage on one particular carriers' network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

- MIDDLE MILE BACKHAUL

In addition, Union is upgrading its middle mile capabilities in key sections of Wyoming that will allow adequate backhaul facilities to its new 3G and 4G network core.

The first of these upgrades is located in Carbon County, WY between the towns of Hanna and Saratoga. This project connects two new service providers and allow connectivity into several key remote offices within Union Telephone Company's network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

The second middle mile upgrade was determined to be necessary after 3G/4G deployments in and around the FCC Mobility Fund Phase I deployments starting becoming accessible to consumers. The steep uptake in data services required further upgrades from Rawlins north to the towns of Casper and Riverton to maintain the long-term data speed requirements across all six census tracts as required by fund.



Study Area Code: 518001  
Study Area Name: Carbon, WY  
Program Year: 2016  
Contact Person: Chris Reno  
Contact Telephone Number: 307-782-6131  
Contact Email: [creno@unionwireless.com](mailto:creno@unionwireless.com)  
Carrier Reference Name: Carbon WY-1

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STATUS – This portion of the project is under construction. Please refer to Section II for more details on the status of the network deployment.

- CARBON WY-1 (T56007968000) 4G HSPA+

This is by far the largest single undertaking and largest funding tract in Union Telephone Company's overall project. This census tract is split in two areas, with the east being the communities of Saratoga, Encampment and Ryan Park while the west is Medicine Bow Routt National Forest. This project consists of six overlays on existing Union Telephone facilities and five new site deployments. After completing the overlays near the communities, an additional overlay was added to the project at an existing Union Telephone central office to facilitate greater capacity and data speeds for the rural consumer.

TYPE OF BACKHAUL – Given the remote nature of sites in and around Wyoming, Union Wireless is using licensed microwave wherever feasible and unlicensed microwave if no available licenses are capable of being obtained. We are targeting at least 25 Mbps of IP backhaul to each cell tower.

SPECTRUM – In this market, we are utilizing spectrum currently licensed to Union Telephone Company. Licensed frequencies in the cellular, PCS, AWS and 700 MHz bands will be used as necessary to maintain the network requirements provided in the scope of this project.

KEY RISKS OR CHALLENGES - Given that this is by far the largest cluster geographically and in manner of funding, Union Wireless is taking a staged approach to completing this project. By first deploying the network on the 6 overlay sites, Union Wireless is ensuring that the area gets covered adequately.

For the new sites located primarily within the Medicine Bow Routt National Forest, our goal is to site the towers to ensure the least impact to the National Forest, while still meeting the requirements on performance and coverage along the eligible roads. Discussions with the USFS representatives have led to questions about roads shown in the tiger road maps that have been decommissioned or to which the USFS no longer allows public access. The USFS has also expressed interest in testing locations for adequate coverage prior to pursuing permanent installations. Primarily, however, Union is targeting private lands within the forest bounds.

Union Telephone Company has also determined that going after 4G speeds would also be beneficial for the cluster, as not only is the timelines related to the acquisition of sites on the Forest a bit of a concern,



Study Area Code: 518001

Study Area Name: Carbon, WY

Program Year: 2016

Contact Person: Chris Reno

Contact Telephone Number: 307-782-6131

Contact Email: [creno@unionwireless.com](mailto:creno@unionwireless.com)

Carrier Reference Name: Carbon WY-1

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but the amount of wilderness and rolling terrain pose a unique challenge. Most of Wyoming has little to no form of ground clutter; however, this region has a large population of various deciduous and coniferous trees. Combine this with the eastern portion of the cluster having a reasonable population center, by taking the 4G route, Union Wireless will be better positioned in meeting the targeted timelines for this very challenging terrain and clutter.

Union Wireless intends to utilize HSPA+ technologies initially, but will also be looking to how LTE performs in other areas and whether the lower frequencies or higher frequencies do well with the varied clutter.

STATUS – This portion of the project is in construction and deployment and drive testing. Please refer to Section II for more details on the status of the network deployment.









Study Area Code: 518001  
Study Area Name: Carbon, WY  
Program Year: 2016  
Contact Person: Chris Reno  
Contact Telephone Number: 307-782-6131  
Contact Email: [creno@unionwireless.com](mailto:creno@unionwireless.com)  
Carrier Reference Name: Carbon-1

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## PROJECT STATUS DESCRIPTION

### SECTION III: PROJECT BUDGET STATUS

#### Overlay Sites

- 5 each
  - New hardware Required
    - New Node B Base Station gear \$60,000 each
    - New Microwave gear for IP Backhaul \$150,000 each
    - Upgrades to tower antenna complex \$20,000 each
    - Labor to related projects \$50,000 each

Each overlay site estimated at \$300,000 cost each, total \$1,500,000 capital contribution

#### New Sites

- 5 each
  - New hardware Required
    - Tower installation
      - Leasing, zoning, permitting costs \$65,000 each
      - Tower site construction \$75,000 each
      - Tower Steel \$45,000 each
      - Lines, antennas, generators \$50,000 each
    - New Node B Base Station gear \$60,000 each
    - New Microwave gear for IP Backhaul \$50,000 each
    - Upgrades to tower antenna complex \$5,000 each
    - Labor to related projects \$50,000 each

Each overlay site estimated at \$400,000 cost each, for a \$2,000,000 total capital contribution for new sites.

Other related projects include 1 fiber to the site backhaul upgrade which will cost roughly \$350,000.

This totals roughly \$3.85 million in capital costs related to the build out.

Union is projecting incremental operating expenses for this site over 5 years to be \$4.29 million.



Study Area Code: 518001

Study Area Name: Carbon, WY

Program Year: 2016

Contact Person: Chris Reno

Contact Telephone Number: 307-782-6131

Contact Email: [creno@unionwireless.com](mailto:creno@unionwireless.com)

Carrier Reference Name: Carbon-1

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BUDGET STATUS –

Core Network and Middle Mile Backhaul Upgrades:	\$1,246,843.42
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Carbon WY-1 3G HSPA+:	\$1,105,552.02
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Total Support Applied to Design/Construction/Deployment:	<b>\$2,352,395.44 – ON BUDGET</b>
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Total Support Applied to Maintenance:	<b>\$0 – ON BUDGET</b>
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<b>Mobility Fund</b> <b>Phase 1 - §54.1009 Annual Reporting</b> <b>Data Collection Form</b>	FCC Form Approved by OMB OMB 3060-1185 Avg. Burden Estimate per Respondent: 18 Hours
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<b>&lt;010&gt; Study Area Code</b>	518002	
<b>&lt;015&gt; Study Area Name</b>	Union Telephone Company	<b>Accepted / Filed</b>  <b>JUL - 1 2016</b>  <b>Federal Communications Commission</b> <b>Office of the Secretary</b>
<b>&lt;020&gt; Program Year</b>	2016	
<b>&lt;030&gt; Contact Name: Person USAC should contact with questions about this data</b>	Todd Slamowitz	
<b>&lt;035&gt; Contact Telephone Number: Number of the person identified in data line &lt;030&gt;</b>	7035848678 ext.	
<b>&lt;039&gt; Contact Email: Email of the person identified in data line &lt;030&gt;</b>	tslamowitz@fccclaw.com	

<b>&lt;040&gt; Has the information required pursuant to §54.1009 been provided with a Form 481 filing (Y/N)</b>	<b>&lt;040&gt;</b>	<input checked="" type="radio"/> <input type="radio"/>
<b>&lt;041&gt; Attach a description of the documents filed with the Form 481 reporting</b>	<b>&lt;041&gt;</b>	<div style="border: 1px solid black; padding: 2px;">Line 041-Union.pdf</div>
<b>&lt;042&gt; Cite the Study Area Code (SAC) for the Form 481 reporting</b>	<b>&lt;042&gt;</b>	<div style="border: 1px solid black; padding: 2px;">519905</div>

<b>&lt;080&gt; Tribal Lands Reporting (y/n?)</b>		<input type="radio"/> <input checked="" type="radio"/>
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(Does this study area cover tribal lands? Yes or No)

**Notice to Individuals Required by the Paperwork Reduction Act of 1995**

OMB Control Number 3060-1185 (Annual Report for Mobility Fund Phase I Support, FCC Form 690 and Record Retention Requirements)

Notice to Individuals Required by the Paperwork Reduction Act of 1995

Public reporting burden for this collection of information is estimated to average 18 hours per response. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, Office of Managing Director, AMD-PERM, Washington, DC 20554, Paperwork Reduction Act Project (3060-1185). Please DO NOT SEND COMPLETED FORMS TO THIS ADDRESS. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number and/or we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1185.

THIS NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

<010>	Study Area Code	518002
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	talamowitz@fccclaw.com

**Reporting Carrier / Mobility Fund Phase 1 Winning Bidder**

<110>	FCC Registration Number	1630201
<111>	Filing Carrier Name	UNION TELEPHONE COMPANY
<112>	Winning Bidder Carrier Name	UNION TELEPHONE COMPANY
<113>	Street Address (or PO Box)	PO BOX 160
<114>	City	MOUNTAIN VIEW
<115>	State	WY
<116>	Zip-Code	82939
<117>	Telephone Number	3077826131 ext.
<118>	Fax Number	3077826913
<119>	Email Address	CRENO@UNIONWIRELESS.COM

**Contact Information**

if same as above, indicate in this box



<120>	Name (First, MI, Last, Suffix)	CHRIS RENO
<121>	Filing Carrier Name	UNION TELEPHONE COMPANY
<122>	Street Address (or PO Box)	PO BOX 160
<123>	City	MOUNTAIN VIEW
<124>	State	WY
<125>	Zip-Code	82939
<126>	Telephone Number	3077826131 ext.
<127>	Fax Number	3077826913
<128>	Email Address	CRENO@UNIONWIRELESS.COM

**Authorized Agent Information**

if no agent, indicate in this box



<130>	Name (First, MI, Last, Suffix)	Todd Slamowitz
<131>	Company	Lukas, Nace, Gutierrez & Sachs, LLP
<132>	Street Address (or PO Box)	8300 Greensboro Drive, Suite 1200
<133>	City	McLean
<134>	State	VA
<135>	Zip-Code	22102
<136>	Telephone Number	7035848678 ext.
<137>	Fax Number	7035848696
<138>	Email Address	tslamowitz@fccclaw.com

518002 Coverage Files.zip, 060 Coverage and Performance Report.zip

[illegible]

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<010> Study Area Code	518002
<015> Study Area Name	Union Telephone Company
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035> Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

## TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING CERTIFICATION DATA ON ITS OWN BEHALF:

<b>Certification of Officer or Employee as to Compliance with 47 CFR §54.1009(a)(4)</b>	
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4), the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	CERTIFIED ONLINE Date 07/01/2016
Printed name of Authorized Officer:	Chris Reno
Title or position of Authorized Officer:	Director of Accounting
Telephone number of Authorized Officer:	3077826131 ext.
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING CERTIFICATION DATA ON THE CARRIER'S BEHALF:

<b>Certification of Officer or Employee to authorize an Agent to file Compliance with 47 CFR §54.1009(a)(4) on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Lukas, Nace, Gutierrez &amp; Sachs, LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4) reported to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: Lukas, Nace, Gutierrez & Sachs, LLP	
Name of Reporting Carrier: Union Telephone Company	
Signature of Authorized Officer or Employee:	Date:
Printed name of Authorized Officer or Employee:	
Title or position of Authorized Officer or Employee:	
Telephone number of Authorized Officer or Employee:	
Study Area Code of Reporting Carrier: 518002	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## TO BE COMPLETED BY THE AUTHORIZED AGENT:

<b>Certification of Agent Authorized to File Compliance with 47 CFR §54.1009(a)(4) on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the certification on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: Union Telephone Company	
Name of Authorized Agent Firm: Lukas, Nace, Gutierrez & Sachs, LLP	
Signature of Authorized Agent or Employee of Agent:	Date: 06/29/2016
Name of Authorized Agent Employee: Todd Slamowitz	
Title or position of Authorized Agent or Employee of Agent: FCC Legal Counsel	
Telephone number of Authorized Agent or Employee of Agent: 7035848678 ext.	
Study Area Code of Reporting Carrier: 518002	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<010>	Study Area Code	518002
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

&lt;142&gt; State

&lt;143&gt; County

&lt;144&gt; Tribal Land(s) on which ETC Serves

&lt;145&gt; Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, Not Applicable) for each of these boxes to confirm the status described on the attached PDF, on line 145, demonstrates coordination with the Tribal government pursuant to § 54.1004 includes:

- <146> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <147> Feasibility and sustainability planning;
- <148> Marketing services in a culturally sensitive manner;
- <149> Compliance with Rights of way processes
- <150> Compliance with Land Use permitting requirements
- <151> Compliance with Facilities Siting rules
- <152> Compliance with Environmental Review processes
- <153> Compliance with Cultural Preservation review processes
- <154> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, Not Applicable)